



U.S. Department of Justice

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August 25, 2016

VIA EMAIL and ECF

Honorable Madeline Cox Arleo
United States District Judge
Martin Luther King, Jr. Federal Building
& Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States v. Michael Cohen,
Crim. No. 15-91 (MCA)

Dear Judge Arleo:

I write to request a second adjournment of the Government's opposition brief to defendant Michael Cohen's motion to withdraw his guilty plea. The Government's response is currently due on August 26, 2016. As I mentioned in my previous correspondence, I was recently assigned the case in the absence of AUSA Herman, and required time to learn the case. Since I last corresponded with Court four weeks ago, I have made extensive efforts to get up to speed on this matter, including speaking to the former Assistant United States Attorney Aaron Mendelsohn who previously handled this matter, the prior defense attorney, the attorney for one of the potential witnesses, and attorneys at the Securities Exchange Commission.

As I have worked to gain a better understanding of the factual background of the case and gain a better understanding of the circumstances that gave rise to the allegations raised by the defendant, I have had some difficulty getting all of the information needed. Gathering the necessary information has proven difficult given some of these individual's travel schedules and the availability of their respective case files, given the age of the matter. Accordingly, the Government submits that an extension of time to file its opposition brief would be in the interest of justice. The additional time will afford me the opportunity to gather the necessary information to prepare my response. Accordingly, I am requesting an extension of time to file our opposition brief by two weeks to September 9, 2016.

While the Government is prepared to appear at the scheduled status conference on Monday, August 29, 2016, should the Court grant the Government an extension, it may also be prudent to adjourn the status conference until the matter is fully briefed. Thank you for your consideration.

Respectfully submitted,

PAUL J. FISHMAN
United States Attorney


By: Dara Aquila Govan
Assistant U.S. Attorney

cc: John Azzarello, Esq. (via e-mail)

The status conference will be heard on
September 12, 2016 at 2:30pm before Judge
Madeline Cox Arleo, USBJ.

SO ORDERED

s/Madeline Cox Arleo
Madeline Cox Arleo, U.S.D.J.

Date: 8/26/16